

Exhibit 2

Notice of Motion and Opportunity to Object

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re)	
)	Chapter 9
CITY OF DETROIT, MICHIGAN,)	
)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	

**NOTICE OF MOTION TO EXCLUDE THE TESTIMONY
OF KENNETH A. BUCKFIRE REGARDING CREDITOR
RECOVERIES UPON DISMISSAL OF THE BANKRUPTCY CASE**

PLEASE TAKE NOTICE that on August 18, 2014, Syncora Guarantee Inc. and Syncora Capital Assurance Inc. filed the *Motion to Exclude the Testimony of Kenneth A. Buckfire Regarding Creditor Recoveries upon Dismissal of the Bankruptcy Case* (the “Motion”) in the United States Bankruptcy Court for the Eastern District of Michigan (the “Bankruptcy Court”) seeking entry of an order to exclude testimony by Mr. Kenneth A. Buckfire as to creditor recoveries upon dismissal of the bankruptcy case.

PLEASE TAKE FURTHER NOTICE that your rights may be affected by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the Motion or you want the Bankruptcy Court to consider your views on the Motion, by **September 1, 2014**, you or your attorney must:

File with the Bankruptcy Court a written response to the Motion, explaining your position, electronically through the Bankruptcy Court’s electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:¹

¹ A response must comply with F. R. Civ. P. 8(b), (c) and (e).

United States Bankruptcy Court
Theodore Levin Courthouse
231 West Lafayette Street
Detroit, MI 48226

You must also serve a copy of any objection or response upon:

James H.M. Sprayregen, P.C.
Ryan Blaine Bennett
Stephen C. Hackney
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

- and -

Stephen M. Gross
David A. Agay
Joshua Gadharf
MCDONALD HOPKINS PLC
39533 Woodward Avenue
Bloomfield Hills, MI 48304
Telephone: (248) 646-5070
Facsimile: (248) 646-5075

If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.

Dated: August 18, 2014

/s/ Stephen C. Hackney

James H.M. Sprayregen, P.C.

Ryan Blaine Bennett

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*Attorneys for Syncora Guarantee Inc. and Syncora
Capital Assurance Inc.*